

1 SETH J. ADAMS, ESQ.  
2 **Nevada Bar No. 11034**  
3 WOODBURN AND WEDGE  
4 Sierra Plaza  
5 6100 Neil Road, Ste. 500  
6 Post Office Box 2311  
7 Reno, Nevada 89505  
8 (Telephone): 775-688-3000  
9 (Fax): 775-688-3088  
10 [sadams@woodburnandwedge.com](mailto:sadams@woodburnandwedge.com)

11 Attorneys for Creditor  
12 Differential Engineering Inc.

13 UNITED STATES BANKRUPTCY COURT

14 DISTRICT OF NEVADA

15 \* \* \*

16 In re:  
17 METAL RECOVERY SOLUTIONS, INC.

Case No. BK-20-50660-BTB  
Chapter 7

**CREDITOR DIFFERENTIAL  
ENGINEERING, INC.'s STATEMENT  
OF ISSUES ON APPEAL AND  
DESIGNATION OF RECORD ON  
APPEAL**

18 Debtor.  
19 \_\_\_\_\_/

20 Creditor, DIFFERENTIAL ENGINEERING INC. ("Differential"), by and through  
21 its attorneys, WOODBURN AND WEDGE, filed a notice of appeal of the "Order on  
22 Omnibus Objection to Claims 2 and 3" entered on the docket on April 13, 2022, as  
23 Docket No. 203 in Case No. 20-50660. Differential hereby submits, pursuant to FRBP  
24 8009, this statement of issues on appeal and the designation of the record on appeal.

25 **STATEMENT OF ISSUES ON APPEAL**

- 26 1. Whether the Bankruptcy Court erred in sustaining the omnibus objection to  
27 Differential Engineering's Proofs of Claim, No.'s 2 and 3 and denying the  
28 claims in their entirety?

2. Whether the Bankruptcy Court committed reversible error in considering evidence at issue in a separate, pending adversary proceeding as well as allowing the Chapter 7 Trustee to introduce, and argue in support of, new legal theories during the evidentiary hearing on the objections to claim?

### **DESIGNATION OF RECORD ON APPEAL**

The following documents filed in In re: Metal Recovery Solutions, Inc., Case No. 20-50660:

Filing Date	Docket No.	Description
7/06/2020	1	Chapter 7 Voluntary Petition Non-Individual. Fee Amount \$335. Filed by REW R. GOODENOW on behalf of Metal Recovery Solutions, Inc. (GOODENOW, REW)
7/08/2020	9	Amended Voluntary Petition. <b>Item(s) Amended:</b> updated form. Filed by REW R. GOODENOW on behalf of METAL RECOVERY SOLUTIONS, INC. (GOODENOW, REW) (Entered: 07/08/2020)
11/11/2020	67	Non-Individual Summary of Assets and Liabilities, Schedule[s]A/B, Real Property Amount: \$ 0, Personal Property Amount: \$ 1,036,500.00, with Certificate of Service Filed by REW R. GOODENOW on behalf of METAL RECOVERY SOLUTIONS, INC. (GOODENOW, REW) (Entered: 11/11/2020)
6/18/2021	108	Omnibus Objection to Claim 2-3 of DIFFERENTIAL ENGINEERING, INC. in the amount of \$958,707, \$766,858 <i>REDACTED</i> , <i>Filed Publicly</i> Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (BUBALA, LOUIS) (Entered: 06/18/2021)
6/18/2021	109	Declaration Of: LOUIS M. BUBALA III Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS) (Entered: 06/18/2021)
6/18/2021	110	Ex Parte Motion to Seal Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC.)(BUBALA, LOUIS) (Entered: 06/18/2021)

6/25/2021	111	Order Granting Motion To Seal (Related Doc # <a href="#">110</a> ) (cly) (Entered: 06/25/2021) Notice of Hearing Hearing Date: 07/30/2021 Hearing Time: 2:00 p.m. Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS) (Entered: 06/30/2021)
7/13/2021	120	Notice of Deposition of 30(b)(6) Representative of DIFFERENTIAL ENGINEERING, INC. with Certificate of Service Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (BUBALA, LOUIS) (Entered: 07/13/2021)
7/13/2021	121	Notice of Deposition of 30(b)(6) Representative of Debtor METAL RECOVERY SYSTEMS, INC. with Certificate of Service Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (BUBALA, LOUIS) (Entered: 07/13/2021)
7/22/2021	122	Adversary case 21-05066. Complaint Filed by CHRISTOPHER P. BURKE, in his capacity as Chapter 7 Trustee of METAL RECOVERY SOLUTIONS, INC vs. METAL RECOVERY SOLUTIONS, INC., THOMAS SEAL, JETTE SEAL, DIFFERENTIAL ENGINEERING, INC., MARK SHONNARD Fee Amount \$350. (02 (Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy))(13 (Recovery of money/property - 548 fraudulent transfer)(13 (Recovery of money/property - 548 fraudulent transfer)(13 (Recovery of money/property - 548 fraudulent transfer)(12 (Recovery of money/property - 547 preference)(LEHNERS, MICHAEL) (Entered: 07/22/2021)
7/23/2021	123	Motion to Quash or for Protective Order with Certificate of Service Filed by SETH J. ADAMS on behalf of DIFFERENTIAL ENGINEERING INC. (Related document(s) <a href="#">120</a> Notice filed by Creditor GEO-LOGIC ASSOCIATES, INC., <a href="#">121</a> Notice filed by Creditor GEO-LOGIC ASSOCIATES, INC.)(ADAMS, SETH) (Entered: 07/23/2021)
7/30/2021	127	Motion for Order Shortening Time Filed by SETH J. ADAMS on behalf of DIFFERENTIAL ENGINEERING INC.(Related document(s) <a href="#">123</a> Motion to Quash or for Protective Order filed by Creditor DIFFERENTIAL ENGINEERING INC.. ) (ADAMS, SETH). Modified on 8/2/2021 to relate to doc #123 (Hannan, KS). (Entered: 07/30/2021)
7/30/2021	128	Declaration Of: Seth J. Adams in Support of Motion for Order Shortening Time Filed by SETH J. ADAMS

		on behalf of DIFFERENTIAL ENGINEERING INC. (Related document(s) <a href="#">127</a> Motion for Order Shortening Time filed by Creditor DIFFERENTIAL ENGINEERING INC.) (ADAMS, SETH) (Entered: 07/30/2021)
8/13/2021	136	Opposition with Certificate of Service Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">123</a> Motion to Quash filed by Creditor DIFFERENTIAL ENGINEERING INC..) (BUBALA, LOUIS) (Entered: 08/13/2021)
8/13/2021	137	Declaration Of: MICHAEL LEHNERS Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">136</a> Opposition filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS). Modified on 8/16/2021 to remove relationship to doc #123 (Hannan, KS). (Entered: 08/13/2021)
8/16/2021	138	Reply with Certificate of Service Filed by SETH J. ADAMS on behalf of DIFFERENTIAL ENGINEERING INC. (Related document(s) <a href="#">136</a> Opposition filed by Creditor GEO-LOGIC ASSOCIATES, INC..) (ADAMS, SETH) (Entered: 08/16/2021)
8/19/2021	142	Stipulation By GEO-LOGIC ASSOCIATES, INC. and Between DIFFERENTIAL ENGINEERING, INC. and Trustee CHRISTOPHER P. BURKE <i>Regarding Authorization to Pursue Claim Objection</i> Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC., <a href="#">123</a> Motion to Quash filed by Creditor DIFFERENTIAL ENGINEERING INC.) (BUBALA, LOUIS) (Entered: 08/19/2021)
8/20/2021	143	Stipulated/Agreed Order (Related document(s) <a href="#">142</a> Stipulation filed by Creditor GEO-LOGIC ASSOCIATES, INC..) (cly) (Entered: 08/20/2021)
8/24/2021	144	Response with Certificate of Service Filed by SETH J. ADAMS on behalf of DIFFERENTIAL ENGINEERING INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC..) (ADAMS, SETH) (Entered: 08/24/2021)
8/24/2021	145	Declaration Of: Thom Seal, Ph.D., PE with Certificate of Service Filed by SETH J. ADAMS on behalf of DIFFERENTIAL ENGINEERING INC. (Related document(s) <a href="#">144</a> Response filed by Creditor DIFFERENTIAL ENGINEERING INC.) (ADAMS, SETH) (Entered: 08/24/2021)

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1	8/31/2021	146	Reply To Differential Engineering, Inc.'s Response To Omnibus Objection To Claims Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">144</a> Response filed by Creditor DIFFERENTIAL ENGINEERING INC.. ) (BUBALA, LOUIS). Modified on 9/1/2021 to replace relationship to doc #144 (Hannan, KS). (Entered: 08/31/2021)
2	8/31/2021	147	Declaration Of: LOUIS M. BUBALA III Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">146</a> Reply filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS) (Entered: 08/31/2021)
3	10/12/2021	158	Notice of Filing Under Seal Transcripts Of Dr. Thomas Seal Depositions Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (BUBALA, LOUIS) (Entered: 10/12/2021)
4	10/12/2021	159	Ex Parte Motion to File Under Seal the Deposition Transcripts of the Representative of Debtor and Differential Engineering, Inc. Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (BUBALA, LOUIS) (Entered: 10/12/2021)
5	10/12/2021	160	Supplement Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS) (Entered: 10/12/2021)
6	10/15/2021	163	Order Granting Motion To File Under Seal (Related Doc # <a href="#">159</a> ) (cly) (Entered: 10/15/2021)
7	10/22/2021	167	Supplemental Document TRUSTEE with Certificate of Service Filed by MICHAEL LEHNERS on behalf of CHRISTOPHER P. BURKE (LEHNERS, MICHAEL). Related document(s) <a href="#">108</a> Omnibus Objection to Claim 2-3 of DIFFERENTIAL ENGINEERING, INC. in the amount of \$958,707, \$766,858 REDACTED, Filed Publicly Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. filed by Creditor GEO-LOGIC ASSOCIATES, INC.. Modified on 10/25/2021 to relate to #108 (Ivey, SD). (Entered: 10/22/2021)
8	10/22/2021	168	Supplement to Response to Omnibus Objection to Claims with Certificate of Service Filed by SETH J. ADAMS on behalf of DIFFERENTIAL ENGINEERING INC. (Related document(s) <a href="#">144</a> Response filed by Creditor DIFFERENTIAL ENGINEERING INC.) (ADAMS, SETH) (Entered: 10/22/2021)
9	10/26/2021	169	Supplemental Reply CREDITOR GEO-LOGIC ASSOCIATES, INC.S REDACTED SUPPLEMENTAL REPLY IN SUPPORT OF ITS OBJECTION TO

		<i>CLAIMS OF DIFFERENTIAL ENGINEERING, INC.</i> (CLAIM NOS. 2-3) Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC..) (BUBALA, LOUIS) (Entered: 10/26/2021)
10/26/2021	170	Ex Parte Motion to File Under Seal with Proposed Order Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Attachments: # <a href="#">1</a> PROPOSED ORDER)(BUBALA, LOUIS) (Entered: 10/26/2021)
10/26/2021	171	Declaration Of: LOUIS M BUBALA III Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">169</a> Reply filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS). Modified on 10/27/2021 to remove relationship to doc #108 (Hannan, KS). (Entered: 10/26/2021)
10/26/2021	172	Supplement with Certificate of Service Filed by SETH J. ADAMS on behalf of DIFFERENTIAL ENGINEERING INC. (Related document(s) <a href="#">167</a> Document filed by Trustee CHRISTOPHER P. BURKE) (ADAMS, SETH) (Entered: 10/26/2021)
10/28/2021	173	Order Granting Motion To File Under Seal (Related Doc # <a href="#">170</a> ) (cly) (Entered: 10/28/2021)
11/1/2021	175	Document <i>DESIGNATION OF DEPOSITION TESTIMONY PURSUANT TO LOCAL RULE 7032</i> Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS) (Entered: 11/01/2021)
11/15/2021	180	Joint Exhibit <i>Exhibits 1-64</i> Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (Attachments: # <a href="#">1</a> Exhibit 1 # <a href="#">2</a> Exhibit 2 # <a href="#">3</a> Exhibit 3 - FILED UNDER SEAL # <a href="#">4</a> Exhibit 4 - FILED UNDER SEAL # <a href="#">5</a> Exhibit 5 - FILED UNDER SEAL # <a href="#">6</a> Exhibit 6 - FILED UNDER SEAL # <a href="#">7</a> Exhibit 7 - FILED UNDER SEAL # <a href="#">8</a> Exhibit 8 - FILED UNDER SEAL # <a href="#">9</a> Exhibit 9 - FILED UNDER SEAL # <a href="#">10</a> Exhibit 10 - FILED UNDER SEAL # <a href="#">11</a> Exhibit 11 - FILED UNDER SEAL # <a href="#">12</a> Exhibit 12 - FILED UNDER SEAL # <a href="#">13</a> Exhibit 13 - FILED UNDER SEAL # <a href="#">14</a> Exhibit 14 - FILED UNDER SEAL # <a href="#">15</a> Exhibit 15 - FILED UNDER SEAL # <a href="#">16</a> Exhibit 16 - FILED UNDER SEAL # <a href="#">17</a> Exhibit 17 - FILED UNDER SEAL # <a href="#">18</a> Exhibit 18 - FILED UNDER SEAL # <a href="#">19</a> Exhibit 19 - FILED UNDER



		SEAL # <a href="#">20</a> Exhibit 20 - FILED UNDER SEAL # <a href="#">21</a> Exhibit 21 # <a href="#">22</a> Exhibit 22 # <a href="#">23</a> Exhibit 23 - FILED UNDER SEAL # <a href="#">24</a> Exhibit 24 - FILED UNDER SEAL # <a href="#">25</a> Exhibit 25 - FILED UNDER SEAL # <a href="#">26</a> Exhibit 26 - FILED UNDER SEAL # <a href="#">27</a> Exhibit 27 - FILED UNDER SEAL # <a href="#">28</a> Exhibit 28 - FILED UNDER SEAL # <a href="#">29</a> Exhibit 29 - FILED UNDER SEAL # <a href="#">30</a> Exhibit 30 # <a href="#">31</a> Exhibit 31 # <a href="#">32</a> Exhibit 32 - FILED UNDER SEAL # <a href="#">33</a> Exhibit 33 # <a href="#">34</a> Exhibit 34 - FILED UNDER SEAL # <a href="#">35</a> Exhibit 35 - FILED UNDER SEAL # <a href="#">36</a> Exhibit 36 # <a href="#">37</a> Exhibit 37 - FILED UNDER SEAL # <a href="#">38</a> Exhibit 38 - FILED UNDER SEAL # <a href="#">39</a> Exhibit 39 # <a href="#">40</a> Exhibit 40 - FILED UNDER SEAL # <a href="#">41</a> Exhibit 41 - FILED UNDER SEAL # <a href="#">42</a> Exhibit 42 # <a href="#">43</a> Exhibit 43 - FILED UNDER SEAL # <a href="#">44</a> Exhibit 44 - FILED UNDER SEAL # <a href="#">45</a> Exhibit 45 # <a href="#">46</a> Exhibit 46 # <a href="#">47</a> Exhibit 47 # <a href="#">48</a> Exhibit 48 # <a href="#">49</a> Exhibit 49 # <a href="#">50</a> Exhibit 50 # <a href="#">51</a> Exhibit 51 # <a href="#">52</a> Exhibit 52 # <a href="#">53</a> Exhibit 53 # <a href="#">54</a> Exhibit 54 - FILED UNDER SEAL # <a href="#">55</a> Exhibit 55 - FILED UNDER SEAL # <a href="#">56</a> Exhibit 56 - FILED UNDER SEAL # <a href="#">57</a> Exhibit 57 # <a href="#">58</a> Exhibit 58 - FILED UNDER SEAL # <a href="#">59</a> Exhibit 59 # <a href="#">60</a> Exhibit 60 # <a href="#">61</a> Exhibit 61 # <a href="#">62</a> Exhibit 62 - FILED UNDER SEAL # <a href="#">63</a> Exhibit 63 # <a href="#">64</a> Exhibit 64, Part 1 # <a href="#">65</a> Exhibit 64, Part 2) (BUBALA, LOUIS) (Entered: 11/15/2021)
11/15/2021	181	Joint Exhibit <i>Exhibits 65-87</i> Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (Attachments: # <a href="#">1</a> Exhibit 65 # <a href="#">2</a> Exhibit 66 # <a href="#">3</a> Exhibit 67 - FILED UNDER SEAL # <a href="#">4</a> Exhibit 68 - FILED UNDER SEAL # <a href="#">5</a> Exhibit 69 - FILED UNDER SEAL # <a href="#">6</a> Exhibit 70 - FILED UNDER SEAL # <a href="#">7</a> Exhibit 71 - FILED UNDER SEAL # <a href="#">8</a> Exhibit 72 - FILED UNDER SEAL # <a href="#">9</a> Exhibit 73 - FILED UNDER SEAL # <a href="#">10</a> Exhibit 74 - FILED UNDER SEAL # <a href="#">11</a> Exhibit 75 - FILED UNDER SEAL # <a href="#">12</a> Exhibit 76 - FILED UNDER SEAL # <a href="#">13</a> Exhibit 77 # <a href="#">14</a> Exhibit 78 - FILED UNDER SEAL # <a href="#">15</a> Exhibit 79 - FILED UNDER SEAL # <a href="#">16</a> Exhibit 80 - FILED UNDER SEAL # <a href="#">17</a> Exhibit 81 - FILED UNDER SEAL # <a href="#">18</a> Exhibit 82 - FILED UNDER SEAL # <a href="#">19</a> Exhibit 83 - FILED UNDER SEAL # <a href="#">20</a> Exhibit 84 - FILED UNDER SEAL # <a href="#">21</a> Exhibit 85 - FILED UNDER SEAL # <a href="#">22</a> Exhibit 86 - FILED UNDER SEAL # <a href="#">23</a> Exhibit 87 - FILED UNDER SEAL) (BUBALA, LOUIS) (Entered: 11/15/2021)
11/15/2021	182	Joint Exhibit <i>List for Evidentiary Hearing on Objections to Claims of Differential Engineering, Inc.</i> Filed by LOUIS M. BUBALA III on behalf of GEO-

		LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">180</a> Exhibit filed by Creditor GEO-LOGIC ASSOCIATES, INC., <a href="#">181</a> Exhibit filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS) (Entered: 11/15/2021)
11/15/2021	183	Ex Parte Motion to Seal <i>to File Under Seal Confidential Evidentiary Hearing Exhibits</i> Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">180</a> Exhibit filed by Creditor GEO-LOGIC ASSOCIATES, INC., <a href="#">181</a> Exhibit filed by Creditor GEO-LOGIC ASSOCIATES, INC.)(BUBALA, LOUIS) (Entered: 11/15/2021)
11/16/2021	184	Order Granting Motion To Seal (Related Doc # <a href="#">183</a> ) (cly) (Entered: 11/16/2021)
11/22/2021	185	Document <i>Creditor Geo-Logic Associates, Inc.s Amended Designation of Deposition Testimony Pursuant to Local Rule 7032 (Public Version)</i> Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">175</a> Document filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS) (Entered: 11/22/2021)
11/22/2021	186	Ex Parte Motion to Seal <i>Amended Designation of Confidential Deposition Testimony of Thom Seal</i> Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">185</a> Document filed by Creditor GEO-LOGIC ASSOCIATES, INC.)(BUBALA, LOUIS) (Entered: 11/22/2021)
11/24/2021	187	Supplemental Briefing Scheduling Order (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC..) (mmm) (Entered: 11/24/2021)
11/24/2021	188	Order Granting Motion To Seal (Related Doc # <a href="#">186</a> ) (mmm) (Entered: 11/24/2021)
12/02/2021	189	Transcript regarding Hearing Held on 11/15/21. The transcript may be viewed at the Bankruptcy Court Clerk's Office. For additional information, you may contact the Transcriber Access Transcripts, Telephone number 855-873-2223. Purchasing Party: Louis Bubala. Redaction Request Due By 12/23/2021. Redacted Transcript Submission Due By 01/3/2022. Transcript access will be restricted through 03/2/2022. (ACCESS TRANSCRIPTS, LLC) (Entered: 12/02/2021)
12/02/2021	190	Transcript regarding Hearing Held on 11/16/21. The transcript may be viewed at the Bankruptcy Court Clerk's Office. For additional information, you may



		contact the Transcriber Access Transcripts, Telephone number 855-873-2223. Purchasing Party: Louis Bubala. Redaction Request Due By 12/23/2021. Redacted Transcript Submission Due By 01/3/2022. Transcript access will be restricted through 03/2/2022. (ACCESS TRANSCRIPTS, LLC) (Entered: 12/02/2021)
12/02/2021	191	Transcript regarding Hearing Held on 11/19/21. The transcript may be viewed at the Bankruptcy Court Clerk's Office. For additional information, you may contact the Transcriber Access Transcripts, Telephone number 855-873-2223. Purchasing Party: Louis Bubala. Redaction Request Due By 12/23/2021. Redacted Transcript Submission Due By 01/3/2022. Transcript access will be restricted through 03/2/2022. (ACCESS TRANSCRIPTS, LLC) (Entered: 12/02/2021)
12/06/2021	198	Brief <i>Opening Post Hearing Brief</i> with Certificate of Service Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC.) (BUBALA, LOUIS) (Entered: 12/06/2021)
12/22/2021	199	Supplemental Brief ( <i>Post Evidentiary Hearing</i> ) with Certificate of Service Filed by SETH J. ADAMS on behalf of DIFFERENTIAL ENGINEERING INC. (Related document(s) <a href="#">187</a> Order) (ADAMS, SETH) (Entered: 12/22/2021)
1/05/2022	200	Reply <i>Brief in Support of it's Objection to Claims of DIFFERENTIAL ENGINEERING, INC (Claims Nos. 2-3)</i> with Certificate of Service Filed by LOUIS M. BUBALA III on behalf of GEO-LOGIC ASSOCIATES, INC. (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC..) (BUBALA, LOUIS) (Entered: 01/05/2022)
1/07/2022	201	Memorandum Decision (BNC) (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC..) (arv) (Entered: 03/31/2022)
3/31/2022	202	Memorandum Decision (BNC) (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC..) (arv) (Entered: 03/31/2022)
3/31/2022	203	Order On Omnibus Objection To Claim 2 And 3 (Related document(s) <a href="#">108</a> Objection to Claim filed by Creditor GEO-LOGIC ASSOCIATES, INC..) (arv) (Entered: 03/31/2022)

Appellant reserves the right to add to the record on appeal.

### **TRANSCRIPTS**

Appellant has acquired, or is the process of acquiring, transcripts which pertain to this appeal. Appellant reserves the right to amend the following list, but anticipates providing transcripts affiliated with the following hearings and depositions:

<b>Date:</b>	<b>Description:</b>
08/17/2021	Hearing on Motion to Quash (ECF No. 139)
09/07/2021	Hearing on Omnibus Objection to Claim
10/04/2021	Deposition of Dr. Thom Seal, taken on October 4, 2021 (30(b)(6) Representative)
10/05/2021	Deposition of Dr. Thom Seal, taken on October 5, 2021 (30(b)(6) Representative)
11/15/2021	Transcript re: Evidentiary Hearing, Day 1 of 3
11/16/2021	Transcript re: Evidentiary Hearing, Day 2 of 3
11/19/2021	Transcript re: Evidentiary Hearing, Day 3 of 3

DATED this 27<sup>th</sup> day of April 2022.

WOODBURN AND WEDGE

By /s/ Seth J. Adams, Esq.  
Seth J. Adams, Esq.  
Attorney for Creditor  
Differential Engineering Inc.

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the law firm of Woodburn and Wedge, and that on the 27<sup>th</sup> day of April, 2022, I caused the foregoing document to be delivered to the parties entitled to notice in this action by:

\_\_\_\_\_ placing a true copy thereof in a sealed, stamped envelope with the United States Postal Service at Reno, Nevada

\_\_\_\_\_ personal delivery

\_\_\_\_\_ email

  X   electronic filing

\_\_\_\_\_ Federal Express or other overnight delivery

as follows:

**MICHAEL R. BROWN**

PARSONS BEHLE &  
LATIMER

201 S. MAIN ST, STE 1800  
SALT LAKE CITY, UT 84111  
(801) 532 1234  
(801) 536 6111 (fax)  
mbrown@parsonsbehle.com

representing

**METAL RECOVERY SOLUTIONS,  
INC.**

PO BOX 13014  
RENO, NV 89507  
(Debtor)

**LOUIS M. BUBALA, III**

KAEMPFER CROWELL  
50 W. LIBERTY ST., STE  
700  
RENO, NV 89501  
(775) 852 3900  
(775) 327 2011 (fax)  
lbubala@kcnvlaw.com

representing

**GEO-LOGIC ASSOCIATES, INC.**

C/O LOUIS M. BUBALA III  
KAEMPFER CROWELL  
50 W. LIBERTY ST., STE 700  
RENO, NV 89501  
(Creditor)

**REW R. GOODENOW**

PARSONS BEHLE &  
LATIMER  
50 W LIBERTY ST, STE 750  
RENO, NV 89501  
(775) 323-1601  
(775) 348 7250 (fax)  
ecf@parsonsbehle.com

representing

**METAL RECOVERY SOLUTIONS,  
INC.**

PO BOX 13014  
RENO, NV 89507  
(Debtor)

**MICHAEL LEHNERS**

429 MARSH AVE  
RENO, NV 89509  
(775) 786-1695  
(775) 786-0799 (fax)  
michaellehners@yahoo.com

representing

**CHRISTOPHER P. BURKE**

702 PLUMAS STREET  
RENO, NV 89509  
775 333-9345  
TRUSTEECBURKE@CHARTER.NET  
(Trustee)

*/s/ Jennifer Heston*

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